

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CAROLYN EPTER and BILL EPTER

Plaintiff,

07 Civ. 3781 (CLB) (GAY)

-against-

**RULE 26(a)**

**INITIAL DISCLOSURES**

HYATT CORPORATION,

Defendant.

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**C O U N S E L O R :**

**RULE 26(a) INITIAL DISCLOSURES**

Pursuant to Fed. R. Civ. P. 26(a)(1)(A)-(D), defendant HYATT CORPORATION hereby submits to plaintiffs CAROLYN EPTER and BILL EPTER, certain information (set forth below) and documents in its possession, custody and control that may be responsive to Fed. R. Civ. P. 26(a). This information and these documents constitute the Rule 25(a) Initial Disclosures of the defendant HYATT CORPORATION. This Initial Disclosure is based on the information that is reasonably available to defendant HYATT CORPORATION at the present time.

Defendant HYATT CORPORATION reserves its right to supplement disclosure up to and through and including the time

of trial pursuant to Fed. R. Civ. P. 26(a) and the local Rules of the Southern District of New York.

1. The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

**RESPONSE:** All employees of Yipeee, Inc., now doing business as HMG. On the evening of the alleged incident of September 30, 2006, upon information and belief, Yipeee, Inc., now doing business as HMG provided all bartenders and wait staff for the party where the accident is to alleged to have occurred.

Upon information and belief, the following is a list of names of the individuals that worked for HMG at the party where the alleged incident occurred:

- (a) Hank Richards - (Captain);
- (b) Estela Naranjo;
- (c) Clint McEvoy;
- (d) David O. Roberts;
- (e) Carola Enright;
- (f) Jorge Bergman;
- (g) Darren Ley;

(h) Edinson Dutruel;  
(i) Omar Johnstone;  
(j) Carlos Rollet;  
(k) Johana Rollet;  
(l) Yerika Nunez;  
(m) Manuel Saldana;  
(n) Daniel Clinton;  
(o) Alfred Diaz;  
(p) Joshua Larson;  
(q) Veronique Weil;  
(r) Cinna Vesterberg;  
(s) Kendel Bennett;  
(t) Sean Howard;  
(u) Tracy Caputo;  
(v) Andre McSween;  
(w) Patricia Berry;  
(x) Cornel Bradford;  
(y) Anthony Willis;  
(z) Tamar Nemorin;  
(aa) Edsel Vera;  
(bb) Margitt Andrade;  
(cc) Daniel Berhe;  
(dd) Rachel Bowman;

(ee) Youssouf Diaguaraga;

(ff) Michelle Colon;

(gg) Ellie Mayer;

(hh) Khalil Hill;

(ii) Alicia Blasingame;

(jj) Jose Estrella;

(kk) Khadija I. Outanine;

(ll) Jason McMahon;

(mm) Stacey Haughton;

(nn) Joey Costello;

(oo) Luis A. Alberto;

(pp) Judith Colon;

(qq) Elsa Bracero;

(rr) Karen DiPeri/President  
Hospitality Marketing Group  
35 Worth Street, 4th Floor  
New York, New York 10013  
(212) 965-9600 (T)  
(212) 965-1902 (F)

[www.hmgny.com](http://www.hmgny.com)

Upon information and belief, Ms. DiPeri was President of the company that provided all the bartenders and waitresses at the party in question and would have hired the person who is alleged to have attempted to pick up the plaintiff and allegedly dropping her causing the alleged injury.

(ss) Andrew Davidson  
General Manager  
Hyatt Regency Jersey City

(tt) Angel Quiles  
Director of Engineering  
Hyatt Regency Jersey City

(uu) Colleen Wasson  
Manager  
Since transferred to Grand Hyatt New York

2. A copy of, or a description by category and location of, all documents, data compilations, tangible things that are in the possession, custody or control of the party and that the disclosing party may use to support its claim or defenses, unless solely for impeachment.

**RESPONSE:** Attached as Exhibit "A" is a copy of the Staffing Service Agreement between Hyatt Corporation and Yipeee, Inc. effective as of December 1, 2002 and still effective on the date of the alleged September 30, 2006 incident.

Attached hereto as Exhibit "B" please find a complete copy of the Guest Account bill and other charges for plaintiffs William Epter and Carolyn Epter as to their stay at the Hyatt Regency Jersey City on the Hudson.

Dated: New York, New York  
February 25, 2008

JONES HIRSCH CONNORS & BULL P.C.

By: 

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